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August 2, 2022

Via ECF

The Honorable Nancy Hershey Lord
United States Bankruptcy Judge
United States Bankruptcy Court
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

***Re: Spyro Avdoulos v. Nikolaos Letsios, et al.
Adv. Pro. No. 19-01070-nhl
FKB File No. 313.263***

Dear Judge Lord:

We represent Third-Party Defendants Stevan H. LaBonte, Esq., and LaBonte Law Group, PLLC (collectively “Attorney LaBonte”), in the above-captioned adversary proceeding.

During the most recent pre-trial conference held on June 30, 2022, Your Honor instructed the parties to address discovery issues in this pending adversary proceeding. As we discussed with Your Honor during the conference, we do not object to the request by Richard J. McCord, Esq. (the “Trustee”) to proceed with discovery against Northern Boulevard Automall, LLC, d/b/a Long Island City Volkswagen, 5615 Northern LLC, 142 North LLC, 54 Bway LLC, Dio Long LLC, 2545 Borden LLC, Dio North LLC, Valley Merrick LLC and Spyro Avdoulos (collectively “Defendants”) in *In re Northern Boulevard Automall, LLC*, Chapter 11 Case No.: 19-41348-nhl.

However, to the extent Defendants seek to proceed with discovery against the Third-Party Defendants in the instant adversary proceeding, we respectfully request discovery be stayed during the pendency of the Defendants’ motion to withdraw the reference, and the pending dispositive motions filed by certain Third-Party Defendants. We respectfully submit the Court has wide discretion to consider such a request. *See Quigley Company, Inc., v. Law Offices of Peter G. Angelos*, 676 F.3d 45, 52 (2d Cir. 2012) (reaffirming the power of the bankruptcy court to stay litigation against third-parties).

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Respectfully submitted,

FURMAN KORNFELD & BRENNAN LLP

/s/Spencer A. Richards

Spencer A. Richards